

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: : CHAPTER 13
Marlettia Smith AKA Marletta Smith :
Debtor : BANKRUPTCY NO.: 17-10191-elf

RESPONSE TO MOTION FOR RELIEF

Debtor, by her attorney, Brandon J. Perloff, Esq. by way of answer to Movant's motion, respectfully represents the following:

1. -5. Admitted.
- 6.-7. The Debtor is without the requisite knowledge to attest the veracity of Movant's averment and therefore said averment is Denied.
8. The Debtor intends to cure any arrears currently due.
9. Denied. The allegations contained in this paragraph constitute legal conclusions to which no response is required.
10. Neither Added, nor denied. Movant's averment contains facts based on information on record before the Court.
- 11.-12. Admitted.
- 13.-14. Denied. The allegations contained in this paragraph constitute legal conclusions to which no response is required.
15. Movant's averment does not call for a response.
16. Denied. The allegations contained in this paragraph constitute legal conclusions to which no response is required.

WHEREFORE, Debtor pray that the Movant's request for relief be denied.

Date: May 25, 2018

/s/ Brandon J. Perloff
Brandon J. Perloff Esquire.
Attorney for Debtor